

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified on Exhibit A in the above referenced action. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001 (a “9/11 decedent”) or is the Personal Representative for a family member of a 9/11 decedent.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs’ Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court’s ECF system to ease the burden on the Clerk of the Court’s Office and the size of this MDL.

Dated: October 5, 2021

/s/ Jerry S. Goldman

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EXHIBIT A to Kim Motion to Substitute Parties

	Previous Personal Representative:	Case Number:	Substitute Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	9/11 Decedent's Name:
1.	Chang Don Kim as Personal Representative of the Estate of Soh Ryang Kim, deceased, the late parent of Lawrence Don Kim	1:18-cv-11870	Catherine Fleming as Personal Representative of the Estate of Soh Ryang Kim, deceased, the late parent of Lawrence Don Kim	WA	Lawrence Don Kim
2.	Anne Marie Hartney as Personal Representative of the Estate of Margaret Colette Fegan, deceased, the late parent of Sean B. Fegan	1:18-cv-11870	Peter Fegan as Personal Representative of the Estate of Margaret Colette Fegan, deceased, the late parent of Sean B. Fegan	NY	Sean B. Fegan
3.	William H. Taylor, III as Personal Representative of the Estate of Anne T. Fisher, deceased, the late parent of John Roger Fisher	1:18-cv-11870	Catherine Chiola as Personal Representative of the Estate of Anne T. Fisher, deceased, the late parent of John Roger Fisher	NJ	John Roger Fisher